

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA)	INDICTMENT NO. 4:25cr-019
)	
v.)	18 U.S.C. § 922(a)(1)(A)
)	Manufacturing a Firearm
WILLIE PUSKAS)	Without a License

THE GRAND JURY CHARGES THAT:

COUNT ONE

Manufacturing a Firearm Without a License
18 U.S.C. § 922(a)(1)(A)

Sometime on or around January 24, 2024, in Bryan County, within the Southern District of Georgia, the Defendant

WILLIE PUSKAS,

not being a licensed manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of manufacturing firearms.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in Count One of this Indictment, the Defendant **WILLIE PUSKAS** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense, including, but not limited to the following:

- Aero Precision X15 Receiver/Frame bearing serial number X566736;
- Aero Precision X15 Receiver/Frame bearing serial number X564979;
- Aero Precision X15 Receiver/Frame bearing serial number X566728;
- Aero Precision M5 Receiver/Frame bearing serial number US181894;
- PTR Industries Unknown Rifle bearing serial number BW03599;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583545;
- Aero Precision M5 Receiver/Frame bearing serial number US356073;
- Aero Precision X15 Rifle bearing serial number X076764;
- Joe Bob Outfitters, LLC ML-15 Receiver/Frame bearing serial number KS-00387;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583083;
- Unknown Manufacturer Unknown Machine Gun bearing no serial number;


- Palmetto State Armory G3-10 Receiver/Frame bearing serial number G394516;
- Aero Precision X15 Receiver/Frame bearing serial number X566730;
- Brownells Inc BRN-180 Rifle bearing serial number 180-04963;
- Aero Precision X15 Rifle bearing serial number X311263;
- Aero Precision X15 Receiver/Frame bearing serial number X566721;
- Aero Precision X15 Receiver/Frame bearing serial number X564972;
- Aero Precision X15 Receiver/Frame bearing serial number X566726;
- Aero Precision X15 Receiver/Frame bearing serial number X566745;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583081;
- Aero Precision M5 Receiver/Frame bearing serial number US356076;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583090;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0585907;
- Advanced Armament Corp of Georgia Cyclone Silencer bearing serial number C03459;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-583070;
- Advanced Armament Corp of Georgia Cyclone Silencer bearing serial number C03460;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583088;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-566343;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0583094;
- Aero Precision M4E1 Receiver/Frame bearing serial number M4-0585917;
- Aero Precision M5 Receiver/Frame bearing serial number US333084;

- Aero Precision X15 Rifle bearing serial number X566738;
- Stag Arms Stag-15 Rifle bearing serial number W-0073705;
- Springfield Armory Saint Receiver/Frame bearing serial number SE75763;
- Aero Precision X15 Receiver/Frame bearing serial number US356079; and
- Stag Arms Stag-15 Rifle bearing serial number W-0073747.

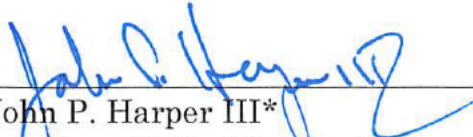
A True Bill.

Foreperson

Tara M. Lyons
Acting United States Attorney



Tania D. Groover
Assistant United States Attorney
Chief, Criminal Division



John P. Harper III*
Assistant United States Attorney
*Lead Counsel



Timothy P. Dean
Assistant United States Attorney
*Co-lead Counsel